

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Application of Pacific Gas and Electric
Company (U39E) for Approval of Demand
Response Programs, Pilots and Budgets for
Program Years 2018-2022.

Application 17-01-012
(Filed January 17, 2017)

And Related Matters.

Application 17-01-018
Application 17-01-019

**COMMENTS OF STEM, INC. TO THE ADMINISTRATIVE LAW JUDGE'S RULING
ISSUING EVALUATION REPORT OF THE DEMAND RESPONSE AUCTION
MECHANISM PILOT, NOTICING JANUARY 16, 2019 WORKSHOP, AND DENYING
MOTION TO REQUIRE AUDIT REPORTS IN THE EVALUATION REPORT**

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January 11, 2019

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In accordance with the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), Stem, Inc. submits these comments to the *Administrative Law Judge’s Ruling Issuing Evaluation Report of the Demand Response Auction Mechanism Pilot, Noticing January 16, 2019 Workshop, and Denying Motion to Require Audit Reports in the Evaluation Report* (“Ruling”), filed by Administrative Law Judges (“ALJ”) Kelly A. Hymes on January 4, 2019. In a procedural email served to parties of A.17-01-012, *et al.* on January 7, 2019, ALJ Hymes clarified that these comments are intended to be a short, general description of proposed improvements to the Demand Response Auction Mechanism (“DRAM”) that will also be presented at the January 16, 2019 workshop.

I. DISCUSSION

Stem proposes the following for consideration in DRAM program design:

- Aligning settlement for flex/real time bidding with available data streams (i.e., 15-minute data) OR allow Demand Response Providers (“DRPs”) to submit

proprietary meter data (even if not using meter generator output (“MGO”) that aligns with the CAISO settlement timeline (i.e. 5-minute data to align with 5-minute settlement)

- Allowing partial re-assignment of contracts either by month or partial contracted amount

II. CONCLUSION

Stem appreciates the opportunity to submit these comments to the Ruling and looks forward to working with the Commission and stakeholders at the upcoming workshops.

Respectfully submitted,



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